

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL 8 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Implementation of the Local Competition)
Provisions in the Telecommunications Act)
of 1996)

CC Docket No. 96-98

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COMMENTS OF THE ASSOCIATION
FOR LOCAL TELECOMMUNICATIONS SERVICES

Pursuant to the public notice released June 21, 1996, the Association for Local Telecommunications Services ("ALTS") hereby submits these comments concerning the release of a "working copy of an industry demand and supply simulation model" in the above proceeding.¹

ALTS appreciates the goals reflected in the Commission's decision to release for comment a "staff model of the telecommunications industry which allows users of the model to calculate a variety of outputs from nearly 200 specifications." Quantitative analysis has significant potential for the Commission, and ALTS has strongly supported the Commission's efforts in this regard, such as In the Matter of Local Competition Data Collection, CCB-IAD 95-110.

Unfortunately, the "model" which was released for comment

¹ ALTS is the national trade association of over thirty facilities-based competitive providers of access and local exchange services.

06

lacks technical explanation, fails to specify the range of variables that were actually used by Staff, and, instead, inserts "dummy" variables in the released version. Most significantly, the released version fails to explain why such a tool was ever created in the first place. The public version of the model thus poses the same problem as a corpse lacking in head or hands. It's hard enough to perform an identification, far less offer any useful comments.

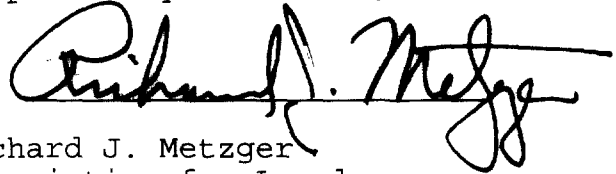
No doubt the original purpose of the model was entirely well intentioned, the original inputs prudently chosen, and any comments made by private parties were offered in the spirit of greater precision. But, absent any explanation about what that purpose was, what variables were actually used, and what comments, if any, were offered from private parties, ALTS declines to make any such assumption. Instead, the Commission should make no use of either the "model" or any progeny it may have given birth to until such time as all relevant factors have been made public and all parties have been given the opportunity to comment.

CONCLUSION

Until such time as all critical information concerning the purpose, assumptions, and discussions with any private parties concerning the model are made available, and comments thereon are solicited, ALTS urgently requests that the Commission place no reliance on any aspect of the "model."

Respectfully submitted,

By:

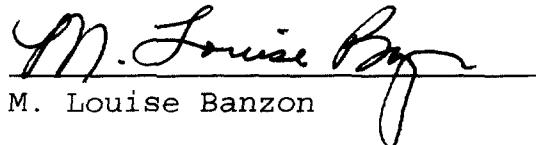
A handwritten signature in black ink, appearing to read "Richard J. Metzger", written over a horizontal line.

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July 8, 1996

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Comments concerning Industry Demand and Supply Simulation Model by the Association for Local Telecommunications Services was served July 8, 1996, on the following persons by First-Class Mail or by hand service, as indicated.


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